

**Company Name** Heineken  
**Industry** Agricultural Products (Supply Chain only)  
**UNGP Core Score (\*)** 21.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
1.5	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
2	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
1.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
2	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>21.5</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: In its Human Rights Policy, the Company states: 'We respect the dignity and human rights of all people. [...] We expect our employees, our management, individuals working for HEINEKEN through a third party contract, our suppliers and business partners, to respect human rights in line with this policy and to ensure that our work complies with our Company's commitments to human rights. Our Human rights Policy is the foundation to help us to understand, avoid and address human rights related risks.' [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: Human rights policy states: 'Our policy is aligned with the following international standards [...] The Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD), The United Nations (UN) Guiding Principles on Business and Human Rights.' In addition, on its website, 'Respecting Human Rights', the Company states: [Our Human Rights Policy] It is based on our endorsement of international standards including the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD) of 2010, and the United Nations (UN) Guiding Principles on Business and Human Rights.' However the wording 'is aligned with ...' or 'is based on...' are not consider a clear commitment following CHRB criteria. [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a> &amp; Respecting Human Rights updated 2020, N/A: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Not met: OECD: See above [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a> &amp; Respecting Human Rights updated 2020, N/A: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: ILO Core: The Human Rights Policy includes 10 standards including respect for ILO core: non discrimination, prohibition of child or forced labor, freedom of association and collective bargaining. [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: Explicitly list All four ILO for AG suppliers: On its website, 'Respecting human rights' the Company indicates: 'The Human Rights policy sets out ten clear standards for human rights as a foundation to help us to understand, avoid and address human rights-related risks: 1. Health &amp; safety; 2. Non-discrimination; 3. No harassment and violence; 4. Child protection; 5. Freedom of association and the right to collective bargaining; 6. No forced labour; 7. Rest and leisure; 8. Fair wages and income; 9. Access to water; 10. Respect for human rights in high risk contexts. We have provided implementation guidance for all our operating companies with concrete implementation guidelines per standard. We expect all our employees, management, individuals working for HEINEKEN (whether directly or through a third party contract), suppliers and business partners to respect human rights in line with our policy'. [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a> &amp; Respecting Human Rights updated 2020, N/A: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: As indicated above, the Company's Human Rights Policy include provision covering all ILO Core. With respect freedom of association and collective bargaining, the policy indicates: 'We respect our employees' freedom of choice to be legally represented by a labour union without fear of retaliation. Where employees are represented by a legally recognised labour union, we will establish a constructive dialogue with this labour union.'</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Where local laws and practices restrict the right to freedom of association and collective bargaining, we endeavour to develop other ways to have a meaningful dialogue with employee representatives, without breaking local law.' [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Respect H&amp;S of workers: The Human Rights Policy has an explicit statement on health and safety: 'Nothing matters more than the safety of our people. Our Life Saving Rules cover our highest safety risks and these need to be strictly followed. The company undertakes to provide a safe and healthy working environment.' [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a> &amp; Global occupational health and safety policy, 01/2012]</li> <li>• Met: H&amp;S applies to AG suppliers: The supplier code states that 'We are committed to provide a safe and healthy work place and prevent harm to our employees, individuals working for us through a third party contract and other visitors. We also expect our Suppliers to meet the following minimum expectations...'. [Supplier Code, 02/2019: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: In relation to its due diligence Human Rights process, the Company states it engages 'with external stakeholders to gather feedback and observations. This includes consulting with international NGOs and relevant local stakeholders as part of our local Human Rights Risk Assessments'. [2019 Annual Report, 21/2/2020: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to engage stakeholders in design: In its Human Rights Policy, the Company indicates: 'We recognise that effective dialogue with relevant external stakeholders is an integral element of assessing our own human rights performance. We value the perspectives of affected stakeholders, in particular local communities. Their input helps to inform our approach to human rights on a global and local level'. [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>
A.1.5	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to remedy: In its Human Rights Policy, the Company states: 'Respect for human rights includes preventing human rights issues or addressing them at an early stage or to seek adequate remedy in case human rights are violated.' [Human Rights Policy, 2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Collaborating with other remedy initiatives: In December 2015, former employees of Bralima, HEINEKEN's subsidiary in the DRC, filed a complaint with the NCP (Dutch National Contact Point) with regard to an alleged violation of the OECD Guidelines. After extensive reviews and constructive discussions, the parties found a satisfactory outcome. [Former employees of Bralima vs. Bralima and Heineken, 18/08/2017: <a href="http://oecdguidelines.nl">oecdguidelines.nl</a>]</li> <li>• Not met: Work with AG suppliers to remedy impacts: The Company includes in its Supplier Code the following provision: 'In the event of non-compliance with the minimum standards, HEINEKEN will work together with Suppliers to take corrective action within an appropriate timeframe.' However, it is not clear whether it will work to remedy any adverse impacts either through the business relationships own mechanisms or through collaborating with them on the development of third party non-judicial remedies. [Supplier Code, 02/2019: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to ILO core conventions.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Senior responsibility for HR: On its website the Company indicates: 'The regional good governance platforms and their respective agendas, receive support and global guidance from the Director Social Sustainability. [...]The HEINEKEN risk control framework embeds respect for human rights in our internal controls. HEINEKEN's Risk Committee maintains oversight of agreed programs and actions to strengthen respect for human rights. The risk committee consists of the chiefs of the global functions and is chaired by HEINEKEN's CFO.' And in its Annual Report, it indicates: 'Focus on sustainability is embedded throughout the business, for example driven by Supply Chain (Every Drop and Drop the C), Procurement (Sustainable Sourcing), HR (Health and Safety) and Commerce (Responsible Consumption). As a part of Brewing a Better World governance, accountability for driving our ambition lies with the HEINEKEN Executive Team globally, and with the general manager of each HEINEKEN operating company locally. Functions (at Global and operating company level) are responsible for defining ambitions and targets, and for implementing, delivering, monitoring and reporting progress on their respective indicators. Corporate Affairs and the Global Sustainable Development team at operating company level oversee Brewing a Better World strategy and drive collaboration and coordination of activities between involved functions.' [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a> &amp; 2019 Annual Report, 21/2/2020: <a href="https://theheinekencompany.com">theheinekencompany.com</a>] Score 2</li> <li>• Met: Day-to-day responsibility: See above. In addition, it states: 'Each operating company has a responsibility for sustainability reporting and a team engaged in delivering Brewing a Better World. [...] Further, we form alliances (tribes) throughout the organisation and with our suppliers to develop new solutions in the focus areas.' [2019 Annual Report, 21/2/2020: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: Day-to-day responsibility for AG in supply chain: See above [2019 Annual Report, 21/2/2020: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: On its website, 'Respecting Human Rights' section, the Company states: 'The 2018 Human Rights policy incorporates work conducted with Shift, the leading centre of expertise on Business and Human Rights, which enabled us to identify our salient human rights risks. [...] We have been developing our Human Rights due diligence process since 2016 together with Shift. The main objective is to better understand and address the human rights risks in our own operations and across our value chains. [...] Until March 2020, we have completed human rights risk assessment workshops in 16 operating companies: Brazil, Cambodia, DRC, Ethiopia, Haiti, Hungary, Indonesia, Jamaica, Mexico, Myanmar, New Zealand, Nigeria, Serbia, South Africa, Timor-Leste and the UK. We had several workshops planned for 2020, but we had to cancel these due to COVID-19. We are developing an online alternative to the physical workshops and we will continue to strengthen regional governance structures and improve human rights monitoring.' 'Engaging with experts, NGOs, communities, employees and (potentially) impacted people in the countries where we operate is vital to better understand and address risk to people. We continue to test our salient risks with the support of NGOs, employees and partners to ensure we do not lose sight of other relevant human rights issues.' [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: Identifying risks in AG suppliers: As stated above, the Company has an objective to address human rights risks in its value chain. [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>] Score 2</li> <li>• Met: Ongoing global risk identification: See above [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: In consultation with stakeholders: 'Engaging with experts, NGOs, communities, employees and (potentially) impacted people in the countries where we operate is vital to better understand and address risk to people. We continue to test our salient risks with the support of NGOs, employees and partners to ensure we do not lose sight of other relevant human rights issues.' [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: In consultation with HR experts: As indicated above, the Company works with Shift. [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Triggered by new circumstances: The Company states 'New circumstances and incidents trigger new approaches and policies and we share our learnings from incidents to prevent future impacts.' However, it is not clear whether new circumstances trigger the due diligence process. [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): In its Annual Report 2019, the Company indicates: 'We started conducting Human Rights Risk Assessments and running action planning workshops in 2016 [...] We conduct risk assessments with Shift, the global leading expert on the UN Guiding Principles on Business and Human Rights. [...] We will continue to deliver workshops in 2020 and will strengthen regional governance structures and improve human rights monitoring.' In its 2017 Annual Report, the Company gave further information about the workshops: 'These workshops will focus on practical and impactful action planning to address identified Human Rights risks. Based on input from stakeholder roundtables with NGOs and academic experts, we set up an internal cross-functional platform gathering HEINEKEN experts for the Africa and Middle East Region addressing Human Rights related issues relevant for the region. We also started to develop operational guidance, with support from Shift, on how to conduct business and operate in challenging social, political, and economic contexts.' In addition, the Company indicates: 'Based on our work with Shift, we have identified seven salient Human Rights risks for our business in our own operations and/or our value chains: discrimination; trade union rights; fair wages and income; child labour in our supply chain; working hours; access to water; and health and safety. Most of the issues identified are especially a risk for our operating companies in emerging economies'. [2019 Annual Report, 21/2/2020: <a href="https://theheinekencompany.com">theheinekencompany.com</a> &amp; Annual report, 2017: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: Public disclosure of salient risks: As indicated above, the Company identified 'seven salient Human Rights risks for our business in our own operations and/or our value chains: discrimination; trade union rights; fair wages and income; child labour in our supply chain; working hours; access to water; and health and safety.' No new relevant information in latest year report. [Annual report, 2017: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: The Company indicates that it has been developing its due diligence process since 2016 and, following the assessment step, in integrating and acting, it states that it 'revised our Human Rights Policy in 2018', that it has strengthened the human rights section of the supplier code, and that it 'established regional internal cross-functional platforms to address human rights related issues relevant for the region. Regional 'Governance platforms' support the implementation of action plans by focusing Operating Companies time and resources on common risks in the region.' [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: Including in AG supply chain: See above. [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Example of Actions decided: The Company explains the assessment carried out in Africa in relation to working conditions of brand promoters. It concluded that that the single biggest issue was that policies and management systems were lacking in many of the agencies, that improvements should be made in procurement and contracting agency services, including background checks, ensuring commitment of and adherence to the supplier code. As a consequence, the Company has defined a set of seven guiding principles and created a new Brand Promoters Policy with guidelines on the contracts and working conditions of brand promoters. To ensure policy implementation, the 'monitoring of compliance with the Brand promoters Policy is now fully embedded into the existing Heineken governance framework'. In addition, 'internal and external compliance audits will be conducted on a periodic basis'. In an update from 2020, the Company states that 'Based on feedback from NGOs and Brand Promoters themselves, we have increased gender balance in our teams of Brand Promoters in many of our markets. To ensure continuous progress, we closely monitor compliance with our Brand Promoters Policy as part of our governance cycle. This includes an annual management self-assessment process. Additionally, HEINEKEN's Global Audit team carried out audits in 12 countries in 2019. Results showed how global implementation of the Brand Promoters Policy has progressed since its introduction in 2018.' [Working with Brand Promoters, 05/2018: <a href="http://theheinekencompany.com">theheinekencompany.com</a> &amp; Working with Brand Promoters (Update 2020), 12/06/2020: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: System to check if Actions are effective: The Company indicates that 'In 2019, the internal Global Audit function conducted in-depth human rights reviews with 12 operating companies around the world. With the support of KPMG, Global Audit has increased capacity to review operating companies against key principles set out in our Human Rights Policy. Identified gaps are included in HEINEKEN's issue management system and operating companies need to develop a mitigation plan to address identified gaps. The progress on these actions is tracked in the issue management system and is closed only if identified gaps are solved or mitigated. Operating companies are regularly reminded of the open issues. We track our human rights performance by this process. Performance against target level of compliance is continuously monitored. Despite the impact of COVID-19 we continue with the in-depth human rights audits for another six operating companies'. [Respecting Human Rights updated 2020, N/A: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: Lessons learnt from checking effectiveness: The Company provides an example related to safety-risk: 'Given its growing presence in emerging markets, safety is an ongoing challenge and a permanent focus area. Rolled up throughout all operations, the HEINEKEN Life Saving Rules target all the activities that carry the greatest safety threats to employees and contractors. Despite these efforts, several significant fatal accidents have occurred, underlining the importance of realising further improvements in the area of safety. In particular, a specific programme to improve road safety, being one of the highest risk areas, has been set up and is being rolled out'. [Annual Report 2018, 02/2019: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process.</li> <li>• Met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• Met: Comms plan re action plans for risks: See indicator B.2.3</li> <li>• Met: Comms plan re reviewing action plans: See indicator B.2.4</li> <li>• Met: Including AG suppliers: See indicators B.2.1 - B.2.4. The description cover human rights impacts involving its supply chain.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Responding to affected stakeholders concerns: 'On 14th December 2015, former employees of Bralima Heineken in Bukavu, DRC (period 1999-2003) notified a specific instance with the Dutch National Contact Point with regard to an alleged violation of the OECD Guidelines for Multinational Enterprises by Bralima in Bukavu, Democratic Republic of Congo, and Heineken N.V., based in Amsterdam, The Netherlands. The NCP concluded that on the basis of the criteria for further examination of the Commentary on the implementation procedure of the OECD Guidelines for multinational enterprises (2000) the notification merited further consideration and offered its good offices to resolve the issue by facilitating a dialogue between the parties. Both parties accepted this offer and an expert mediator was appointed by the NCP. The dialogue was conducted under the chairmanship of the NCP and resulted in a satisfactory outcome for both parties. Final statement describing the process and outcomes of the dialogue.' [NCP - Bralima vs Heineken: <a href="https://oecdguidelines.nl">oecdguidelines.nl</a> &amp; Former employees of Bralima vs. Bralima and Heineken, 18/08/2017: <a href="https://oecdguidelines.nl">oecdguidelines.nl</a>]</li> <li>Not met: Ensuring affected stakeholders can access communications: Following an allegation regarding workers' rights for Brand Promoters, the Company discloses the following: 'Brand Promoters were informed about our pro-active actions to improve their working conditions through a mandatory online training (accessible on mobile devices and PCs) in all relevant languages.' However, it is unclear how the Company systematically ensures affected stakeholders can access communications related to human rights concerns they have raised. [Working with Brand Promoters (Update 2020), 12/06/2020: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The 'speak up' system is available to all employees and allows reporting violations of the code of conduct or any other policy of the Company. The Speak up policy describes the different channels available. This covers a general commitment to Human Rights. [Code of Business Conduct, 09/2018: <a href="https://theheinekencompany.com">theheinekencompany.com</a> &amp; Speak up policy, 09/2018: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Number grievances filed, addressed or resolved: The Company reports: 'The total number of Speak-Up reports received in 2019 was 1699, of which 417 (25%) were related to human rights topics (including discrimination and harassment related concerns). Of these 417 reports, 40% were (partly) substantiated. All (partly) substantiated cases were addressed/resolved through an agreed action-plan to mitigate any identified issues.' [Respecting Human Rights updated 2020, N/A: <a href="https://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>Met: Channel is available in all appropriate languages: The speak up policy states that 'you can use the external Speak Up Service. This gives you the opportunity to raise concerns confidentially and in your own language'. The EthicsPoint website is available in more than 30 languages. [Heineken Ethics point: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>Met: Opens own system to AG supplier workers: Speak up 'is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers) who wish to raise a concern about possible misconduct within our Company'. [Speak up policy, 09/2018: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Grievance mechanism for community: Speak up 'is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers) who wish to raise a concern about possible misconduct within our Company'. The online form on its Ethics point website has a specific section to report human rights issues and it allows anyone, employee or not, not make a report. [Speak up policy, 09/2018: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a> &amp; Heineken Ethics point: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The mechanisms are available on the website and in more than 30 languages. In addition on its website section 'Code of Business Conduct', the Company indicates: 'Speak Up is available to anyone, either inside or outside our Company. [...] People outside our Company can follow this link to access our externally operated Speak Up Service. Through this online platform, you have the possibility to directly file a report and to call our independently run confidential hotline.' [Code of Business Conduct website, Ap 2019: <a href="http://theheinekencompany.com">theheinekencompany.com</a> &amp; Heineken Ethics point: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems: In its Supplier Code, the Company 'encourages its Suppliers to implement its own grievance mechanism', however it is not a requirement. [Supplier Code, 02/2019: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Not met: AG supplier communities use global system: The Company indicates in its Brand Promoters Policy, that 'they will also all have access to both HEINEKEN Speak-up and Local Support Line'. In addition, as indicated above, the SpeakUp channel is available to anyone, either inside or outside the Company. However, Brand Promoters are vendors, and not apart of the supply chain. While the Speak Up system is available to anyone, the policy states that 'This Speak Up policy can be used to raise concerns about suspected misconduct within our Company', no evidence could be found of agricultural suppliers' affected communities having access to this mechanism to raise concerns about supplier operations. [Brand Promoters Policy: <a href="http://theheinekencompany.com">theheinekencompany.com</a> &amp; Speak up policy, 09/2018: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes introduced to stop repetition: As part of the agreement with Bralima former employees, the Company committed to improve its policy and practices on doing business in a volatile and conflict-affected countries, which it is doing with the updated version of its Human Rights Policy and with the updating of other related policies and Codes (Supplier Code). In addition, the Company took different measures to respond to the allegations with respect to the working conditions of Brand Promoters employed in Africa, specifically related to harassment. The Company responded with an investigation, policy creation, its implementation and monitoring actions. [Former employees of Bralima vs. Bralima and Heineken, 18/08/2017: <a href="http://oecdguidelines.nl">oecdguidelines.nl</a> &amp; Annual Report 2018, 02/2019: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> <li>• Met: Evaluation of the channel/mechanism: The Company's whistleblowing mechanism was evaluated by Transparency International NL, and awarded a score of 82.7%. Additionally, it states 'We regularly evaluate and improve the Speak Up procedure, including communication and awareness of Speak Up within the organisation and our trusted representatives framework.' [Whistleblowing Frameworks 2019, 2020: <a href="http://transparency.nl">transparency.nl</a> &amp; Respecting Human Rights updated 2020, N/A: <a href="http://theheinekencompany.com">theheinekencompany.com</a>]</li> </ul>

## Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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